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MAY 07 2007

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NORTHERN DISTRICT OF CALIFORNIA
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APR 27 2007

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6 Attorneys for Plaintiff NEW AMSTERDAM
 PROJECT MANAGEMENT HUMANITARIAN
 FOUNDATION

8 **UNITED STATES DISTRICT COURT**
 9 **NORTHERN DISTRICT OF CALIFORNIA**

11 NEW AMSTERDAM PROJECT
 12 MANAGEMENT HUMANITARIAN
 13 FOUNDATION, a Dutch non-profit
 corporation

14 Plaintiff,

15 v.

16 KELLY M. LAUGHRIN, CAMPBELL,
 17 WARBUTON, FITZSIMMONS,
 18 SMITH, MENDELL & PASTORE a
 California corporation; and
 DOES 1 through 25,

19 Defendants.

CASE NO.: C07-00935 HRL

20
 21 **STIPULATION AND PROPOSED
 ORDER CONTINUING THE CASE
 MANAGEMENT CONFERENCE
 AND RELATED DEADLINES**

22 Plaintiff New Amsterdam Project Management Humanitarian Foundation
 23 ("NAF") and Defendants Kelly Laughrin and Campbell Warbuton, Fitzsimmons,
 24 Smith Mendell & Pastore ("Defendants"), by and through their respective attorneys of
 record, hereby stipulate and agree with reference to the following facts:

25 The complaint was filed on February 14, 2007;

26 On February 16, 2007, Plaintiff sent Notices of Lawsuit and Request for Waiver
 27 of Service of Summons to Defendants;

28 On March 19, 2007, Campbell Warbuton, Fitzsimmons, Smith Mendell &

1 Pastore executed the Notice of Lawsuit and Request for Waiver of Service of
2 Summons;

3 On March 15, 2007 Kelly M. Laughrin executed the Notice of Lawsuit and
4 Request for Waiver of Service of Summons;

5 On April 13, 2007, counsel for Defendants requested, and NAF consented to, a
6 two week extension of time to respond to the complaint;

7 And on April 17, 2007, this Court issued an order granted the Defendants'
8 request for an extension of time as an unopposed motion under Civil L. R. 6-3, giving
9 Defendants up to and including May 1, 2007 to respond to the complaint;

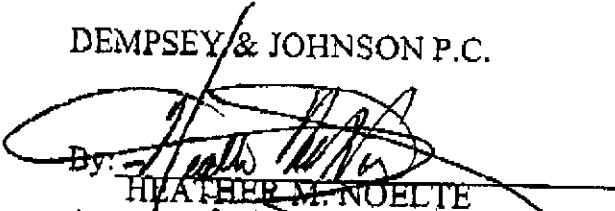
10 A case management conference has been scheduled in the matter for May 22,
11 2007 with corresponding deadlines of May 1, 2007 to meet and confer under Fed. R.
12 Civ. Pro. 26 and May 15, 2007 to exchange initial disclosures.

13 Given that the case is not at issue and Defendants' responsive pleading is not
14 due until the deadline for meeting and conferring under Rule 26,
15

16 IT IS HEREBY STIPULATED AND AGREED, subject to the approval of the
17 Court, that the Case Management Conference currently set for May 22, 2007 in
18 Courtroom 2 at 1:30 p.m. be continued to July 17, 2007, with corresponding deadlines
19 of June 28, 2007 to meet and confer under Fed. R. Civ. Pro. 26 and July 10, 2007 to
20 exchange initial disclosures.

21
22 DATED: April 27, 2007

DEMPSEY & JOHNSON P.C.

23 By: 

24
25 HEATHER M. NOELTE
26 Attorneys for Plaintiff
27 NEW AMSTERDAM PROJECT
28 MANAGEMENT HUMANITARIAN
PROJECT

04-27-07 01:06pm From-DEMPEY & JOHNSON PC

19105312901

T-355 P.03/04 F-499

DATED: April 27, 2007

ROPER, MAJESKI, KOHN & BENTLEY

By: RICHARD M. WILLIAMS
Attorneys for Defendants,
KELLY M. LAUGHRIN, CAMPBELL
WARBURTON, FITZSIMMONS, SMITH
MENDELL & PASTORE

[PROPOSED] ORDER

Good cause appearing therefore;

IT IS HEREBY ORDERED that the Case Management Conference currently set for May 22, 2007 in Courtroom 2 at 1:30 p.m. is hereby continued to July 17, 2007, with corresponding deadlines of June 28, 2007 to meet and confer under Fed. R. Civ. Pro. 26 and July 10, 2007 to exchange initial disclosures.

CMC continued to July 20, 2007 at 10:30 a.m. in Courtroom 3.

DATED:

By:

HON. HOWARD N. LLOYD Jeremy Fogel
MAGISTRATE JUDGE District Judge
UNITED STATES DISTRICT COURT

1 PROOF OF SERVICE

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 I am employed in the County of Los Angeles, State of California; I am over the
4 age of 18 years and am not a party to the within action. I am employed by the law
5 firm of Dempsey & Johnson, located at 1880 Century Park East, Suite 416, Los
6 Angeles, California 90067,

7 On April 27, 2007, I served the foregoing document(s) described as
8 **STIPULATION AND PROPOSED ORDER CONTINUING THE CASE**
9 **MANAGEMENT CONFERENCE AND RELATED DEADLINES** by enclosing
10 the document(s) in a sealed envelope addressed as follows:

11 Richard M. Williams, Esq.
12 Robers, Majeski, Kohn & Bentley
13 80 North First Street
14 San Jose, CA 95113

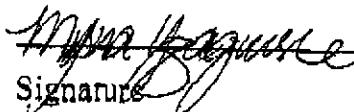
15 **BY MAIL:** I am readily familiar with the business's practice of collection and
16 processing of documents for mailing with the United States Postal Service and
17 that the documents are deposited in the United States Postal Service the same
18 day as the day of collection in the ordinary course of business. The sealed
19 envelope with postage thereon fully prepaid was placed for collection and
mailing on the above date following ordinary business practices.

20 **(State)** I declare under penalty of perjury under the laws of the State of
21 California that the above is true and correct.

22 **(Federal)** I declare that I am employed in the office of a member of the State
23 Bar of this Court at whose direction the service was made. I declare
24 under penalty of perjury under the laws of the United States of
25 America that the above is true and correct.

26 Executed on April 27, 2007, at Los Angeles, California.

27
28 Myrna Yzaguirre
29 Type or Print Name


Signature